

INTRODUCTION

1. The serious concerns which the evidence demonstrates that the SPM overhead line gives rise to necessitate consideration being given to the issue of undergrounding. This is because:
 - a. Of the particularly sensitive location over which the overhead line would pass and
 - b. Because of its adverse cultural heritage impacts which make it unacceptable in planning terms taking account of the specific local environment and context see paragraph 2.8.2 EN-5.

2. The onus in these circumstances lies on the decision maker to give proper consideration to the need to underground and to avoid the unacceptable effects, see 2.8.9. of EN-5, and the decision maker is entitled to require in these circumstances, the applicant to provide sufficient and proper evidence of the likely effects costs and benefits and disbenefits of such undergrounding options as will satisfactorily address the unacceptable effects.

3. Contrary to 1.4 of SPM-025 there is no onus on PCC in this context to provide evidence as to the suitability of undergrounding. Further, paragraph 4.4.3. of EN-1 is directed to those cases in which applicants have properly assessed alternatives within the route selection and scheme selection process. It is not intended, as would be the case here, to absolve the applicant from the responsibility resting on them adequately to investigate alternatives to a scheme that will inevitably cause significant harm and which would, save in wholly exceptional circumstances, justify refusal.

4. The point that neither PCC nor NRW have produced assessments of their undergrounding options against the policy set out in NPS policy EN-5 is a hollow one.

5. In the context of a scheme which is identified as causing substantial harm to one or more scheduled ancient monuments and where refusal is required unless such harm is necessary in order to provide public benefit of national importance, it is reasonable both to expect and require SP-Manweb to provide a robust and rigorous assessment of undergrounding suitably informed by appropriate evidence having regard to all relevant considerations to enable the EN-5 balance to be performed. SPM-025 comes nowhere near achieving the rigour or robustness which the Secretary of State is entitled to accept.

MANWEB’S ROUTE SHORTENED

6. This addresses the initial proposal set out in PCC’s evidence (referred to in SPM-025 as the PCC shortening option) to assist the decision maker properly to address the issue of undergrounding. PCC’s alternative resulted from advice from appropriate experts on landscape and visual impact, the effects on cultural heritage assets and feasibility in terms of engineering. PCC also sought advice on the likely acceptability of the route in ecological terms from NRW. The advice from each of the relevant experts/bodies was that the undergrounding option identified was both feasible and acceptable and importantly, significantly less harmful than the proposed overhead line.

NPS EN-5 CRITERIA	SP MANWEB VIEW ON THE PCC „SHORTENING“ OPTION	PCC RESPONSE
Availability and cost of alternative	SP Manweb notes that PCC does not contest the alternative routes and	PCC does not accept that the proposed method of installation of an

<p>sites, routes and methods of installation :</p>	<p>methods of installation (open cut trenching)</p>	<p>underground cable is not necessarily open cut trenching (thrust-boring is an option on more sensitive parts of the route) further PCC does not accept that there is any requirement for stripping of a 9m working area in order to install an underground cable whether in open ground or otherwise. The requirement for a 9m working area relates to access and soil storage neither of which require soil stripping and further the evidence before the inquiry is that the construction area required is 7m not 9m and that can be provided for as necessary by temporary trackway with soil storage dealt with offsite storage as necessary where sensitive areas are involved.</p>
<p>Benefits of undergrounding</p>	<p>The PCC 'Shortening' option area is of local importance (though not an AONB or National Park).</p>	<p>Contrary to the assertion that the PCC shortening area is of local importance it lies within a LANDMAP</p>

	<p>SP Manweb's Updated ES notes the impacts of the Llandinam Scheme as being moderate adverse in this location.</p> <p>In cumulative scenario 3 there would be a major adverse effect, which would remain even if the Llandinam Scheme were undergrounded. As such, the benefits would, in SP Manweb's view, be low.</p> <p>There are no residential amenity issues for this section of the Llandinam Scheme.</p>	<p>historic landscape aspect area classified as outstanding and therefore of national and international importance and the absence of designation in no sense lessens the weight to be attributed to it. Further it is of equivalent value to land designated as AONB within the Shropshire Hills AONB. PCC's landscape and visual assessment identifies the scheme as having major adverse effects particularly focussed between the A483 and Cae Bettin Wood. Further CADW, CPAT and Atkins each identify the scheme as having a very large/large adverse effect on Crugyn Bank Dyke and the Black Gate enclosure which (albeit not scheduled) is recognised as being of equivalent value to a SAM and worthy of designation.</p> <p>Atkins' work demonstrates that in relation to the Crugyn</p>
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		<p>Bank Dyke and the Black Gate enclosure the harm to those sites from the overgrounded scheme would amount to substantial harm in EN-1 terms.</p> <p>The benefits of undergrounding are therefore high. Indeed so high that without undergrounding PCC has demonstrated that consent should be withheld in favour of route D which avoids all of these unacceptable effects.</p>
<p>Economic effects (including Technical difficulties) of undergrounding:</p>	<p>There are no technical concerns with shortening the remote end sections.</p> <p>There are however some technical concerns with shortening the 1.85km section utilising the bridleway. The lower section of the bridleway might require some civil works to divert a small stream to avoid erosion of the cable trench. There are greater concerns shortening the 0.3km section utilising the</p>	<p>PCC does not understand the concerns in relation to the shortening of the 1.85 km section and the civil engineering works required to achieve the shortening appear straightforward for any competent civil engineer and minor to the extent that restoration is achievable without any permanent scarring.</p> <p>Further repeated concerns about risk of encountering rock formations have no</p>

	<p>proposed footpath. The footpath section runs across a field and particularly the lower section is fairly steep. There is no track to follow and running at right angles to the gradient would possibly require cleating into concrete fixings to avoid cable movement and / or backfill with a concrete based mix to avoid washing away the backfill of the cable trench. This may cause additional scarring. Furthermore, technical difficulties would increase if the bridleway and/ or footpath sections encounter significant rock formations along the routes.</p>	<p>evidential basis. PCC has no issue in terms of the reduced cost which would result in an overall cost of £9.8 million.</p>
<p>Social and environmental impacts of undergrounding:</p>	<p>Assuming these technical difficulties, outlined by Mr Paalman in his evidence, on these sections are surmountable, the 'Shortening' option, which extends to 6.1km, reduces the overall capital costs to</p>	<p>PCC note that SPM do not consider there would be any social effects for this option. In ecological terms the claimed effects appear to be dependant on a need to strip 9m of vegetation</p>

	<p>£5.9M and an estimated lifetime cost (very roughly) of £3.9M, totalling £9.8M for the revised PCC Shortening option.</p> <p>The economic effects would be increased by requiring the necessary permissions and easements.</p> <p>SP Manweb does not consider social effects likely for the PCC Shortening option.</p> <p>In ecological terms, the Upper Ceulanau (bridleway section) follows mature bushy hedgerows and Cwm Mule (footpath section) follows a managed hedgerow with mature trees. These features potentially provide habitat for legally protected species such as dormouse and bats and would be lost. Further survey would be required to assess the full extent of potential impacts, mitigation requirements and statutory</p>	<p>along bridleway as opposed to the construction of a 1 x 1m trench. On the evidence this is an exaggerated and unjustified claim.</p> <p>In cultural heritage terms it is correct that this option would not avoid the substantial harm that would result to the Bryn Cwmyrhiwdre round barrow, but PCC has carefully balanced the costs and benefits of undergrounding against the identified harm and has concluded that on balance the requirement should be that undergrounding should commence immediately to the west of the A483. This approach is not intended in any sense to indicate an acceptance that the effect on the Bryn Cwmyrhiwdre SAM is anything other than one which should be allowed only in wholly exceptional circumstances, rather it reflects PCC's view of the limit of such</p>
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	<p>requirements with regards to these two particular locations. There would be an increased magnitude of impacts to terrestrial habitats and associated species when compared to the Llandinam Scheme.</p> <p>In cultural heritage terms, the western end of the PCC Shortening option would retain "substantial harm" (in Mr Croft's opinion) to Bryn Cwmyrhiwdre round barrow - this is the trigger under which PCC are seeking to justify the PCC option (as Mr Croft seems to equate substantial harm to "serious concerns" - SP Manweb does note though that the reference to "serious concerns" in NPS EN-5 is expressed in terms of potential adverse landscape and visual effects, rather than specific cultural heritage effects).</p> <p>In SP Manweb's view, the landscape contains both extant above ground remains and below ground remains. These remains</p>	<p>harm which can be tolerated before undergrounding is required.</p> <p>PCC note the new suggestion that EN-5 is couched in terms of adverse landscape and visual effects rather than specific cultural heritage effects, however read as a whole EN-5 contemplates consideration of undergrounding whenever the effects of a scheme are particularly significant having regard to sensitive locations. This includes (2.8.9.) locations which are sensitive because of their historic importance, the relationship between significance of a heritage asset and its setting and the relevance of views in that context are accepted by SPM's cultural heritage witness.</p> <p>SPM appear to have undertaken no assessment of the extent to which undergrounding will in fact impact on any shallow</p>
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	<p>may include both shallow and deep remains from both the pre-historic and historic periods. The deeper remains may be present even beneath minor roads and bridleways. A construction area of 9m and the 1m cable trench therefore has the potential to affect sub-surface remains. Mr Croft also suggests the proposed mitigation could address any discovered archaeology in the vicinity of and between the Crugyn Bank Dyke termini. This overlooks that any such remains might be considered of national importance and preservation by record may not be appropriate for such remains. It is key to note that direct impacts on such remains would be permanent and irreversible, compared to the long term temporary and reversible effects of the overhead line. SP Manweb therefore does</p>	<p>or deep remains from either pre-historic or historic periods and further have presented an assessment based on a 9m construction area allegedly requiring soil stripping over the entirety of that area. In contrast Atkins are satisfied that the actual requirement for a 1m cable trench can be accommodated by sensitive routing without any likely significant effect on archaeological remains whether above or below ground. PCC remains satisfied that the cultural heritage implications of under grounding are very limited.</p> <p>In landscape terms PCC has demonstrated that with standard aftercare there is no reason why the presence of a cable route would have any visible long term impacts and in terms of terminal towers, PCC's option ensures these are located so as to have no significant effects.</p>
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	<p>not agree that the cultural heritage implication of undergrounding are very limited.</p> <p>In landscape terms, the bridleway section near Brook House would require the cable to be installed perpendicularly down a steep slope which would require particular care during construction and reinstatement to ensure that the cable route did not remain visible in the long term. There is also a concern regarding the imposition of the terminal towers in exposed locations.</p>	
<p>Conclusion</p>	<p>SP Manweb considers the benefits from undergrounding to be low. Against this, whilst the 6.1km PCC Shortening option is considered technically achievable on the assumption some key concerns can be overcome, there are likely environmental impacts arising from the suggested</p>	<p>PCC has demonstrated that the benefits from undergrounding are significant, that the shortening option is technically achievable as accepted by SPM, that the environmental effects of undergrounding are all likely to be minor and that the cost is significantly less than the</p>

	<p>option that pull against undergrounding and the imposition of the terminal towers. The cost of this option would be £9.8m. Given the low benefit to the landscape of undergrounding (as the major effect would remain and the effect of the Llandinam Scheme on its own is moderate adverse), the ecological and cultural heritage impacts and the remaining landscape impacts, against the increased cost, SP Manweb does not regard the NPS EN-5 test for undergrounding as having been met for the PCC Shortening option.</p>	<p>undergrounding option considered by SPM in its consideration of alternatives. Further, given the significant benefit which would flow from undergrounding and the unacceptable effects in landscape and visual and cultural heritage terms which would result from the Llandinam scheme without undergrounding, the EN-5 test is clearly made out such that in the absence of an undergrounding option consent should be refused.</p>
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PCC UNDERGROUNDING PROPOSAL 1

7. Proposal 1 (referred to in SPM-025 as the “PCC preferred undergrounding option”) is advanced by PCC and reflects PCC’s conclusion that the unacceptable harms that it has identified from the overhead line can be satisfactorily addressed by further shortening of the length of undergrounding when compared to SPM shortened. It reflects a more direct route for undergrounding which reduces cost but with no greater effect on the environment.

NPS EN-5 CRITERIA	SP MANWEB VIEW ON THE PCC OPTION	PCC RESPONSE
Availability and cost of alternative sites, routes and methods of installation:	SP Manweb notes that PCC does not contest the alternative routes and methods of installation (open cut trenching)	PCC does not accept that the proposed method of installation of an underground cable is necessarily open cut trenching (thrust-boring is an option on more sensitive parts of the route) further PCC does not accept that there is any requirement for stripping of a 9m working area in order to install an underground cable whether in open ground or otherwise. The requirement for a 9m working area relates to access and soil storage neither of which require soil stripping and further the evidence before the inquiry is that the construction area required is 7m not 9m and that can be provided for as necessary by temporary trackway with soil storage dealt with by offsite storage as necessary where sensitive areas are involved.
Benefits of undergrounding	The PCC Preferred Undergrounding Option area is of local	Contrary to the assertion that the PCC shortening area is of local importance it lies within

	<p>importance (though not an AONB or National Park).</p> <p>SP Manweb's Updated ES notes the impacts of the Llandinam Scheme as being moderate adverse in this location. In cumulative scenario 3 there would be a major adverse effect, which would remain even if the Llandinam Scheme were undergrounded. As such, the benefits would, in SP Manweb's view, be low. There are no residential amenity issues for this section of the Llandinam Scheme.</p>	<p>a LANDMAP historic landscape aspect area classified as outstanding and therefore of national and international importance and the absence of designation in no sense lessens the weight to be attributed to it. Further it is of equivalent value to land designated as AONB within the Shropshire Hills AONB. PCC's landscape and visual assessment identifies the scheme as having major adverse effects particularly focussed between the A483 and Cae Bettin Wood. Further CADW, CPAT and Atkins each identify the scheme as having a very large/large adverse effect on Crugyn Bank Dyke and the Black Gate enclosure which (albeit not scheduled) is recognised as being of equivalent value to a SAM and worthy of designation.</p> <p>Atkins' work demonstrates that in relation to the Crugyn Bank Dyke and the Black Gate enclosure the harm to those sites from the overgrounded scheme would amount to substantial harm in EN-1</p>
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		<p>terms.</p> <p>The benefits of undergrounding are therefore high. Indeed so high that without undergrounding PCC has demonstrated that consent should be withheld in favour of route D which avoids all of these unacceptable effects.</p>
<p>Economic effects (including technical difficulties) of undergrounding:</p>	<p>Where the PCC Preferred Undergrounding Option east of the B4355 climbs and then falls away perpendicular to the slope contours, the installation of cable would be of concern. Disturbed soil can wash away, causing landslip. This section would be more prone to weathering and erosion, risking the cable becoming shallow/exposed. Open cut installation could permanently scar the landscape, the 9m construction corridor is also of concern. The weight of the cable can pull it down the slope,</p>	<p>Whilst SMP's initial witnesses sought to contend that there would be some technical constraint to the installation of the cable as proposed it is noted that their up to date position is now limited to one of "concern" as to soil wash and land slip. PCC has demonstrated that those concerns are exaggerated with appropriate engineering restoration and aftercare there is no material risk of the cable or any other required infrastructure being exposed or there being any permanent scar in the landscape. PCC do not understand why SPM contend that the nearest practical start would be immediately west of the B4355, nor is it a view that is</p>

	<p>requiring cleating into concrete fixings and laying in an "s" shape (which can itself cause additional scarring). SP Manweb's view is that the nearest practicable start would be immediately west of the B4355 (see pole number 308) - a route approximately 3km long with a net capital cost of £3m and lifetime cost of £1.92m, totalling £4.9m (the "revised PCC Preferred Undergrounding Option").</p> <p>The economic effects would be increased by requiring the necessary permissions and easements.</p>	<p>supported by any credible or relevant evidence.</p> <p>PCC assumes that its figure of £6.6 is accepted.</p>
<p>Social and environmental impacts of undergrounding</p>	<p>SP Manweb does not consider social effects likely for the PCC revised option.</p> <p>In ecological terms, trenching through open ground and potentially crossing small fields/ditches increases</p>	<p>PCC note that SPM do not consider there would be any social effects for this option.</p> <p>In ecological terms PCC has consulted NRW who are satisfied that trenching of its proposal can take place without there being any likely significant effect on the River</p>

	<p>the risk of sediment run off. There is a consequent increased risk of impacting upon the River Wye SAC. There would be an increased magnitude of impacts to terrestrial habitats and associated species when compared to the Llandinam Scheme. In cultural heritage terms, both the PCC Preferred Undergrounding Option and the revised PCC Preferred Undergrounding Option would retain "substantial harm" (in Mr Croft's opinion) to Bryn Cwmyrhiwdre round barrow - this is the trigger under which PCC are seeking to justify the PCC option (as Mr Croft seems to equate substantial harm to "serious concerns" -SP Manweb does note though that the reference to "serious concerns" in NPS EN-5 is expressed in</p>	<p>Wye SAC. Whilst there is inevitably increased disturbance to existing vegetation there is no evidence that vegetation supports any important ecological resource. In cultural heritage terms it is correct that this option would not avoid the substantial harm that would result to the Bryn Cwmyrhiwdre round barrow, but PCC has carefully balanced the costs and benefits of undergrounding against the identified harm and has concluded that on balance the requirement should be that undergrounding should commence immediately to the west of the A483. This approach is not intended in any sense to indicate an acceptance that the effect on the Bryn Cwmyrhywdre SAM is anything other than one which should be allowed only in wholly exceptional circumstances, rather it reflects PCC's view of the limit of such harm which can be tolerated before</p>
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	<p>terms of potential adverse landscape and visual effects, rather than specific cultural heritage effects).</p> <p>In SP Manweb's view, the landscape contains both extant above ground remains and below ground remains. These remains may include both shallow and deep remains from both the pre-historic and historic periods. The deeper remains may be present even beneath minor roads and bridleways. A construction area of 9m and the 1m cable trench therefore has the potential to affect sub-surface remains. Mr Croft also suggests the proposed mitigation could address any discovered archaeology in the vicinity of and between the Crugyn Bank Dyke termini. This overlooks that any such remains might be</p>	<p>undergrounding is required. PCC note the new suggestion that EN-5 is couched in terms of adverse landscape and visual effects rather than specific cultural heritage effects, however read as a whole EN-5 contemplates consideration of undergrounding whenever the effects of a scheme are particularly significant having regard to sensitive locations. This includes (2.8.9.) locations which are sensitive because of their historic importance, the relationship between significance of a heritage asset and its setting and the relevance of views in that context are accepted by SPM's cultural heritage witness.</p> <p>SPM appear to have undertaken no assessment of the extent to which undergrounding will in fact impact on any shallow or deep remains from either pre-historic or historic periods and further have presented an assessment based on a 9m construction</p>
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	<p>considered of national importance and preservation by record may not be appropriate for such remains. It is key to note that direct impacts on such remains would be permanent and irreversible, compared to the long term temporary and reversible effects of the overhead line. SP Manweb therefore does not agree that the cultural heritage implications of undergrounding are very limited.</p> <p>In landscape terms, the revised PCC Preferred Undergrounding Option would not achieve landscape benefits around Black Gate and Two Tumps as a result of the technical difficulties outlined above with installing cable in this section of the revised PCC Preferred Undergrounding Option.</p>	<p>area allegedly requiring soil stripping over the entirety of that area. In contrast Atkins are satisfied that the actual requirement for a 1m cable trench can be accommodated by sensitive routing without any likely significant effect on archaeological remains whether above or below ground. PCC remains satisfied that the cultural heritage implications of undergrounding are very limited.</p> <p>In landscape terms PCC has demonstrated that with standard aftercare there is no reason why the presence of a cable route would have any visible long term impacts and in terms of terminal towers, PCC's option ensures these are located so as to have no significant effects. In landscape terms PCC has demonstrated that there is no technical reason why undergrounding could not be provided to the east of the B4355 as proposed so as to remove the unacceptable impact upon Black Gate and Crugyn Bank Dyke. Further</p>
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		<p>even if there were any such technical constraints, PCC has demonstrated how those can be avoided by re-routing the cable option to follow the B4355 to the north and to re-join the proposed overhead line to the east of the Crugyn Bank Dyke (see the red route on OBJ/002/ENG/01). It is to be noted that SPM have not sought to contend that this option has any material technical constraints and it can be delivered at the same time and at the same cost. It is therefore both a relevant and important alternative having regard to EN-1.</p>
<p>Conclusion</p>	<p>SP Manweb considers the 3km revised PCC Preferred Undergrounding Option to be technically achievable. The costs of undergrounding this section would be £4.9m. Given the low benefit to undergrounding (as the major effect would remain and the effect of the Llandinam Scheme</p>	<p>PCC has demonstrated that the benefits from undergrounding are significant that the shortening option is technically achievable as accepted by SPM that the environmental effects of undergrounding are all likely to be minor and that the cost is significantly less than the undergrounding option considered by SPM in its consideration of</p>

	<p>on its own is Moderate adverse), the ecological and cultural heritage impacts and the remaining landscape impacts, against the increased costs, SP Manweb does not regard the NPS EN-5 test for undergrounding as having been met.</p>	<p>alternatives. Further, given the significant benefit which would flow from undergrounding and the unacceptable effects in landscape and visual and cultural heritage terms which would result from the Llandinam scheme without undergrounding, the EN-5 test is clearly made out such that in the absence of an undergrounding option consent should be refused.</p>
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